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February 5, 2024

VIA ECF

The Honorable Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Jason Jorjani v. New Jersey Institute of Technology, et al.
Civil Action No. 2:18-cv-11693 (WJM-JSA)

Dear Judge Allen:

This office represents the New Jersey Institute of Technology (“NJIT”) and the individual Defendants in this matter. We write on behalf of the parties pursuant to Your Honor’s January 30, 2024 Text Order [D.E. #171] to advise that the deposition of Plaintiff’s expert took place on January 17, 2023 and expert discovery is therefore complete. Accordingly, we respectfully propose the following simultaneous briefing schedule for motions for summary judgment for the Court’s consideration:

- Motions for Summary Judgment due on or before March 15, 2024
- Opposition papers due on or before April 15, 2024
- Reply papers due on or before May 7, 2024

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We thank the Court for its continued attention to this matter. If Your Honor or Your Honor's staff should have any questions or require anything further, we are always available.

Respectfully submitted,

/s/ Marc D. Haefner

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cc: All Counsel of Record (via ECF)